

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

United States of America

Case No. 3:21-CR-00203

Plaintiff,

vs.

Motion to Modify Conditions of
Release

Enroy O'Neil Duncan,

Defendant.

¶ 1. On behalf of Defendant, Enroy O'Neil Duncan, by his attorneys, Sand Law, PLLC:

¶ 2. MOTION:

- a. Defendant hereby moves the Court to modify his conditions of release to permit unrestricted travel for employment purposes.

¶ 3. CASE HISTORY AND FACTS:

- a. Defendant is currently on pretrial release pending the disposition of this matter. As a condition of his Pretrial Release, Defendant's travel is restricted to MD, FL and North Dakota.
- b. Defendant would like to be permitted to have unrestricted travel for purposes of employment. Defendant is currently as a truck driver.
- c. Pretrial Services as well as the USA have both indicated that they do not object to the currently in place restrictions on travel being lifted to the extent that unrestricted travel be permitted for employment purposes.

¶ 4. ARGUMENT:

- a. The Defense believes that these circumstances provide the Court good cause to

modify the currently in place conditions of release.

¶ 5. CONCLUSION:

- a. Based on the foregoing, Defendant humbly requests that the Court enter such Order as is appropriate.

Dated: 6/10/2023

SAND LAW, PLLC
Counsel for Defendant

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